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FEB 18 1993

Before the
Federal Communication Commission
Washington , D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Replacement of Part 90)
by Part 88 to Revise the)
Private Land Mobile Service)

PR Docket 92-235

To : The Commission

COMMENT OF : RAY'S ELECTRONICS INC.

I do not oppose , PR Docket 92-235 change part 90 of FCC rules , but I do oppose the short time frame , and the way it is proposed to be done.

1. Once the public (The Legal Users) is aware of this change, they will no longer purchase radios until this issue is settled.
2. The FCC should make it mandatory that new products built should be compatible for narrow band usage and a standard set for all . This equipment should be tested and proven first which would avoid incompatible systems such as trunking is now.
3. With over 100 million wide band radios in service , the FCC would need to hire an army to enforce these new rules . The way to stop this is to force radio manufactures to build a standardized narrow band radio and market them as radios and equipment to be purchased for new and future replacement equipment.
4. If the FCC is going to continue to allow mail order sales of radios, they must come up with a way that the purchaser will have to prove they have a FCC license to operate on the frequency they are ordering , since most mail order radios are never licensed.
5. Trunking : If the FCC would allow standardized trunking on 450 to 470 mhz bands with an FB-6 type license , it would increase usage of existing systems by over 60 % . I have been monitoring channels in our area for years and find that there are many 1 or 2 users using a repeater system less than 5% of the time.
6. I feel that trunking must be standardized in all bands to allow competition in the industry , to keep prices down and large corporations from having a monopoly as they do now in 800 mhz. bands.

Respectfully submitted,
Ray's Electronics Inc.
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Oak Harbor , Ohio 43449

Scott Renz
Scott Renz, President

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